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May 24, 1994

Mr. William F. Caton, Acting Secretary
Federal Communications Commission
Washington, D.C. 20554

In re: Ex Parte Presentation
Docket No. 90-314
The Ericsson Corporation

Dear Mr. Caton:

Pursuant to the provisions of Section 1.1206 of the Commission's rules, this letter will serve to advise you that on May 24, 1994 representatives of The Ericsson Corporation met with staff members of the PCS Task Force to discuss matters related to unlicensed PCS.

An original and one copy of this letter and materials used in this meeting is being filed in the above-referenced docket. In addition, copies of this letter and associated information are being hand delivered to those who attended this meeting.

Should there be any questions with regard to this matter, kindly communicate directly with the undersigned.

Very truly yours,

David C. Jatlow
Counsel for The Ericsson Corporation

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The Importance of Band Clearing

Statements of UTAM, Inc....

- "The timeframe for band clearing remains dependent upon the success of individual manufacturers in creating and marketing unlicensed PCS products that can provide a source of necessary revenues from clearing fees to fund the relocation process."

The Importance of Band Clearing

Statements of UTAM, Inc....

"In developing its band-clearing philosophy and plan, UTAM is looking for means to maximize the revenues available for microwave relocation in order to expedite the deployment of nomadic devices for both voice and data applications."

Successful Band Clearing

Can only be achieved in a timely manner if...

- As many different technologies as possible can be deployed at the earliest possible time.
- This implies that unlicensed spectrum be made available on an equitable basis for both narrowband *and* wideband technologies.
- Therefore, the Rules should be modified to remove the present inequities which limit access of wideband technologies to only the lower isochronous band. *This band has poor initial market potential due to massive numbers of microwave links that require relocation.*

FCC Rules

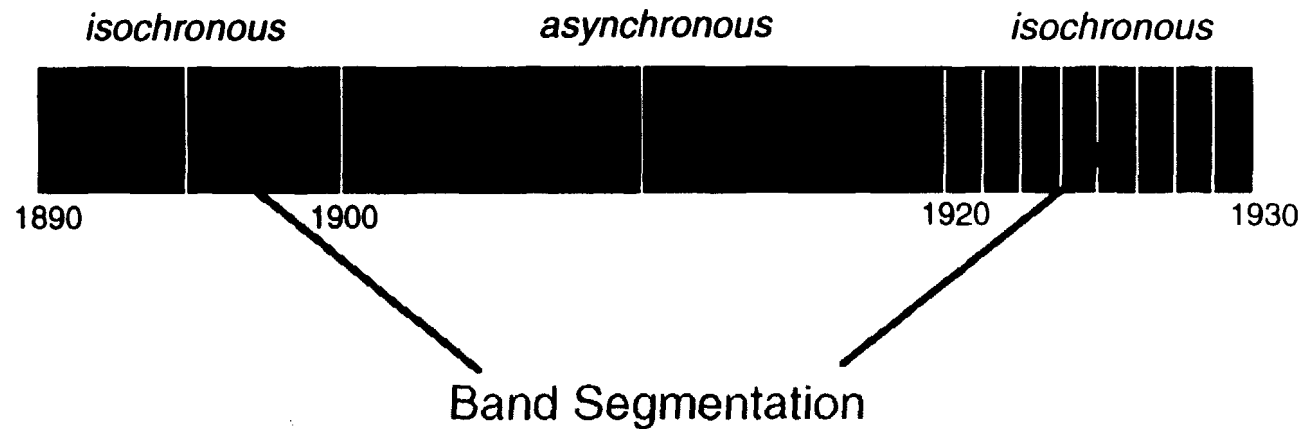
Different rules for two isochronous sub-bands!

15.319(a) establishes two 10 MHz isochronous sub-bands (1890-1900 MHz and 1920-1930 MHz). A total of 20 MHz of spectrum is available.

- 15.321(a) clearly limits the ability of wideband devices to have access to the full 20 MHz of spectrum.
- Narrowband devices, however, are allowed access to the full 20 MHz.

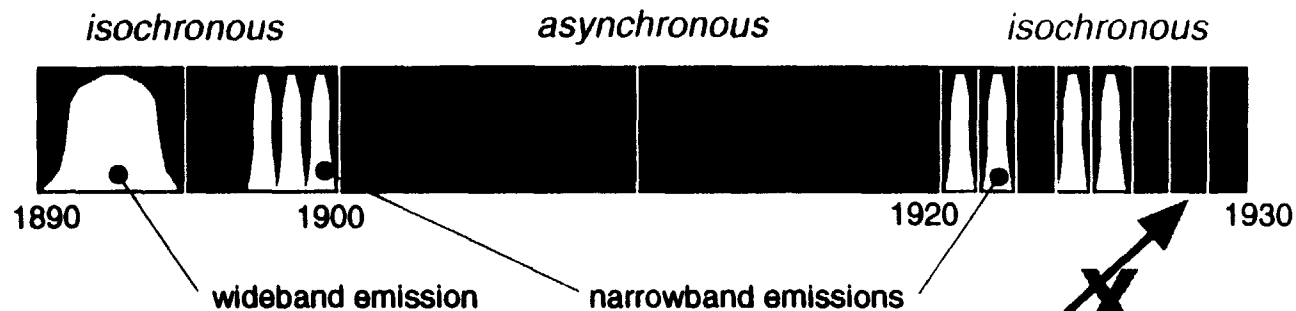
The Unlicensed PCS Band

Rule 15.321 defines band segmentation...



The Unlicensed PCS Band

Wideband systems are limited to accessing only 1/2 the available UPCS spectrum!



Under the present rules, narrowband systems have full access to both isochronous sub-bands. Segmentation creates this inequity.

Segmentation and Band Clearing

Existing unlicensed rules create disincentives to rapid band clearing...

- Significantly fewer links exist in the upper isochronous band than in the lower band.
- It is probable that the upper band will be cleared of u-wave links much sooner.
- Unless the Rules are changed, *only* narrowband technologies will bear the burden of cost associated with the clearing of this band.
- Fairness dictates that in the early deployment period, all types of devices should have equal opportunity. Relocation revenues will be generated quicker.
- The only source of immediate funding for band clearing is existing technologies, many of which are wideband.

The Key to Rapid Band-Clearing

Modify the present Rules to eliminate the inequities created by band-segmentation...

- **Segmentation does NOTHING to assist in the channel location process.**
- **There is consensus among the wideband manufacturers on this issue.**
- **It is unfair to wideband systems because it ALWAYS limits their access to only 50% of the total 20 MHz isochronous allocation.**
- **Narrowband devices are allowed full access to BOTH isochronous bands.**
- **Any difference in the rules for the upper and lower bands creates an unfair situation, discourages technology investment and slows down the band-clearing process.**

The Key to Rapid Band-Clearing

Elimination of band-segmentation...

- Allows both narrowband and wideband manufacturers to supply product for unlicensed isochronous bands.
- Results in greater revenues received in a shorter period of time.
- Earlier revenues provide funds for clearing both the asynchronous and lower isochronous sub-bands.